

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

STREAMLIGHT, INC.	:	
	Plaintiff,	
	:	
v.	:	No. 15-cv-00726-MSG
	:	
KNUCKLEHEADLED.COM,	:	
VIDEOTRONIX & AUDIO INC., and	:	
ROBERT LAMBERS	:	
	Defendants.	:

CONSENT JUDGMENT

WHEREAS, Plaintiff Streamlight, Inc. (“Streamlight”) and Defendants KnuckleHeadLED.com (“KnuckleHead”), Videotronix & Audio Inc. (“Videotronix”), and Robert Lambers (“Lambers”; collectively “Defendants”) have agreed in a separate agreement to settlement of the matters at issue between them and to entry of this Consent Judgment, it is hereby ORDERED THAT:

1. This is an action for (i) patent infringement under 35 U.S.C. § 271 *et seq.*, (ii) federal trademark infringement under the Lanham Act 15 U.S.C. § 1051 *et seq.*, (iii) federal unfair competition under 15 U.S.C. § 1125; (iv) trademark infringement under Pennsylvania common law; (v) unfair competition under Pennsylvania common law; and (vi) trade dress infringement under Pennsylvania common law.

2. This Court has jurisdiction over the subject matter of this action pursuant to the provisions of 28 U.S.C. §§ 1331 and 1338 and 15 U.S.C. §§ 1116 and 1121, and under the principles of supplemental jurisdiction pursuant to 28 U.S.C. § 1367. This Court further has continuing jurisdiction to enforce the terms and provisions of this Consent Judgment. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391.

3. Streamlight is a Delaware corporation having a principal place of business at 30 Eagleville Road, Eagleville, PA.

4. Defendant KnuckleHead is a business, generally operating as an online business, selling lights to residents of the United States, including Pennsylvania.

5. Defendant Videotronix is a Utah corporation having a current principal place of business at 96 North Main Street, Richfield, UT 84701.

6. Defendant Lambers is an individual residing at 310 200 E, Richfield, UT 84701.

7. Streamlight is the assignee of the following U.S. Patents and Trademark Registration: U.S. Patent No. 6,012,824 (the “‘824 Patent”); U.S. Patent No. 8,777,446 (the “‘446 Patent”); U.S. Patent No. D681,246 (the “‘246 Patent”; with the ‘824 Patent and the ‘446 Patent, the “Asserted Patents”); and U.S. Trademark Reg. No. 3,894,722 for “KNUCKLEHEAD” (collectively with Streamlight’s common law rights in the KNUCKLEHEAD trademark, the “KNUCKLEHEAD Mark”).

8. Streamlight’s KNUCKLEHEAD® light embodies a distinctive and unique trade dress which identifies Streamlight as its source (“Streamlight’s Trade Dress”)

9. Defendants admit that the Asserted Patents are valid and enforceable.

10. Defendants admit that the KNUCKLEHEAD Mark is valid and enforceable.

11. Defendants admit that Streamlight maintains valid and enforceable rights in Streamlight’s Trade Dress.

12. Defendants have manufactured, offered to sell, sold, used, imported, and/or distributed in the United States lights that fall within the scope of at least one claim of at least one of the Asserted Patents, in violation of 35 U.S.C. § 271, *et seq.*, and that are likely to cause confusion among consumers with respect to Streamlight’s KNUCKLEHEAD® light.

13. Defendants admit that they have imported, advertised, offered for sale, and sold the KnuckleHeadLED flashlight, as identified in the Complaint.

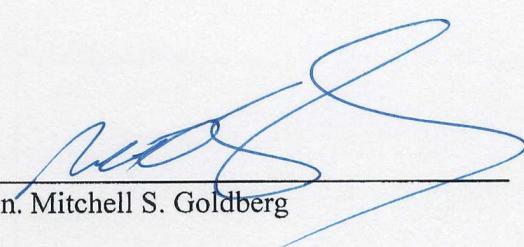
14. The KnuckleHeadLED flashlight infringes at least one claim of each of the Asserted Patents, infringes Streamlight’s KNUCKLEHEAD Mark under both state and federal law, and infringes Streamlight’s Trade Dress and Defendants admit to this infringement.

15. Defendants shall cease any and all manufacturing, selling, offering for sale, using, importing, and distributing of products that infringe any claim of the Asserted Patents, the KNUCKLEHEAD Mark, and/or Streamlight’s Trade Dress, including but not limited to the KnuckleHeadLED light.

16. This matter is dismissed with prejudice, each side to bear their own attorneys' fees and costs.

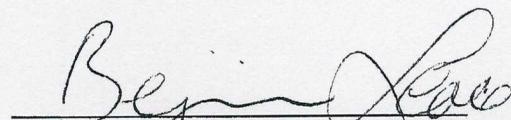
IT IS SO ORDERED:

Date: 5/19/15

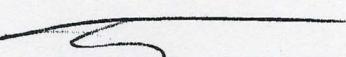
By: 
Hon. Mitchell S. Goldberg

APPROVED AS TO FORM AND CONTENT:

Dated: 5/19/15


Benjamin E. Leace (Pa. No. 54281)
Andrew J. Koopman (Pa. No. 210026)
RatnerPrestia
1235 Westlakes Drive
Suite 301
Berwyn, PA 19312
Phone: (610) 407-0700
Fax: (610) 407-0701
beleace@ratnerprestia.com
akoopman@ratnerprestia.com

ATTORNEYS FOR PLAINTIFF,
Streamlight, Inc.


Todd Rushton
1040 Bountiful Blvd.
Bountiful, UT 84010
Phone: (801) 698-1880
toddrushton@gmail.com

ATTORNEY FOR DEFENDANTS,
KnuckleHeadLED.com,
Videotronix, and
Robert Lambers